

# Exhibit N



William B. Scally – May 23, 2025

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Friday, May 23, 2025

10:03 a.m.

[REDACTED] – [REDACTED]  
[REDACTED]

VIDEOTAPED DEPOSITION of WILLIAM  
B. SCALLY, held at K&L GATES LLP, One  
Congress Street, Boston, Massachusetts,  
pursuant to notice, before Michael D.  
O'Connor, Registered Merit Reporter,  
Certified Realtime Reporter, Certified  
Realtime Captioner.

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1 A P P E A R A N C E S:

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3 ATTORNEYS FOR PLAINTIFF:

4 K&L GATES LLP

5 One Congress Street, Suite 2900

6 Boston, Massachusetts 02114

7 (617) 951-9076

8 BY: CHRISTOPHER CENTURELLI, ESQ.

9 Christopher.Centurelli@klgates.com

10

11 ATTORNEYS FOR DEFENDANT:

12 DENTONS US LLP

13 1221 Avenue of the Americas

14 New York, New York 10020-1089

15 (212) 398-4890

16 BY: STEPHEN YANG, ESQ.

17 stephen.yang@dentons.com

18 FORREST GOTHIA, ESQ.

19 forest.gothia@dentons.com

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10:31:15 1 MR. YANG: Mr. Centurelli, you  
10:31:17 2 will have the opportunity --

10:31:17 3 MR. CENTURELLI: I'm going to  
10:31:18 4 object to the question, and to the  
10:31:19 5 extent you're not letting the witness  
10:31:20 6 answer your question. Okay?

10:31:22 7 MR. YANG: Noted.

10:31:23 8 MR. CENTURELLI: When he's done,  
10:31:24 9 you can ask a follow-up.

10:31:26 10 MR. YANG: He's not being  
10:31:26 11 responsive. I'm asking about his  
10:31:28 12 opinion and he's telling me about  
10:31:30 13 somebody else.

10:31:31 14 MR. CENTURELLI: I'm going to  
10:31:31 15 object as argumentative.

10:31:33 16 MR. YANG: The record is there.

10:31:34 17 Q. Again, I'm asking about your  
10:31:35 18 opinion that you've offered. You started the  
10:31:38 19 damages period from May of 2023, correct?

10:31:40 20 A. Yes.

10:31:44 21 Q. Why did you start from May of  
10:31:46 22 2023?

10:31:47 23 A. I think the factual basis for  
10:31:53 24 starting on or around that timeframe relates to  
10:32:01 25 a notice letter that was served on Yealink by

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10:32:04 1 Barco, and so that's a reasonably reliable  
10:32:09 2 starting point to assess damages.

10:32:12 3 Q. Based on your analysis, is May of  
10:32:27 4 2023 the earliest point in time where Barco has  
10:32:35 5 suffered damages from Yealink's infringement?

10:32:38 6 MR. CENTURELLI: Objection. Form.  
10:32:40 7 And to the extent it calls for a legal  
10:32:42 8 conclusion.

10:32:42 9 A. I don't have a legal conclusion.  
10:32:45 10 However, at least of the six asserted patents  
10:32:50 11 in this case, so the '002, the '951, the '832,  
10:32:56 12 the '103, the '237, '646, of those asserted  
10:33:01 13 patents, I believe the earliest date of those  
10:33:05 14 patents is, if memory serves, and we can look  
10:33:09 15 at my report, but I think it's September of  
10:33:11 16 2020.

10:33:13 17 So without offering a legal  
10:33:15 18 conclusion, Plaintiff would arguably have  
10:33:20 19 protection of its intellectual property rights  
10:33:25 20 as early as that date.

10:33:27 21 Q. Your opinion is not based on that  
10:33:28 22 date, is it?

10:33:29 23 A. My opinion is based on that date,  
10:33:39 24 in addition to other dates.

10:33:40 25 Q. Let me rephrase. Your damages

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10:33:42 1 period does not start in September of 2020,  
10:33:47 2 correct?

10:33:47 3 A. Yes, my damages opinion in my  
10:33:50 4 expert report currently has a start date of May  
10:33:54 5 of 2023, which is consistent with the notice  
10:34:00 6 letter that was served on Yealink by Barco, or  
10:34:03 7 the first notice letter.

10:34:04 8 Q. I understand. In other words, it  
10:34:09 9 is your opinion that Barco is not entitled to  
10:34:11 10 any damages before May of 2023; is that fair?

10:34:14 11 MR. CENTURELLI: Objection. Form.  
10:34:16 12 Asked and answered.

10:34:16 13 A. No, that's not my opinion.

10:34:19 14 Q. So why did you start, and that's  
10:34:22 15 what I'm trying to get at, if that's not your  
10:34:25 16 opinion, why did you start in May of 2023 for  
10:34:30 17 the damages period?

10:34:31 18 MR. CENTURELLI: Objection. Asked  
10:34:32 19 and answered.

10:34:32 20 A. It's consistent with my  
10:34:41 21 methodology. Ultimately, I reasonably relied  
10:34:45 22 on that date as a reasonable starting point.

10:34:51 23 Q. So that's what I'm trying to  
10:34:52 24 understand, your methodology. Can you tell me  
10:34:55 25 a bit more about this methodology in how you

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C E R T I F I C A T E

I, Michael O'Connor, Registered  
Merit Reporter/Certified Realtime Reporter,  
do hereby certify:

That WILLIAM B. SCALLY, the witness  
whose testimony is hereinbefore set forth,  
was duly sworn by me and that such testimony  
is a true and accurate record of my  
stenotype notes taken in the foregoing  
matter to the best of my knowledge, skill  
and ability.

IN WITNESS WHEREOF, I have hereunto  
set my hand and Notarial Seal this 23rd day  
of May 2025.

*Michael O'Connor*

MICHAEL O'CONNOR, RMR, CRR, CRC

Notary Public

My Commission expires:  
November 9, 2029